

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

1st ROCHDALE COOPERATIVE GROUP, LTD.

Debtor.

ROBERT L. GELTZER, as Chapter 7 Trustee for 1st
ROCHDALE COOPERATIVE GROUP, LTD.,

Plaintiff,

v.

GARY ALTMAN, RHODA BROWN, "JOHN DOE 1"
AS EXECUTOR OR ADMINISTRATOR OF THE
ESTATE OF GEORGE CRETAN, SAUL
MILDWORM, JACK RASKIN, DAVID SMITH,
FRANCIS CONNOLLY and JOAN KRAMER AS
EXECUTORS OF THE ESTATE OF ALLEN
THURGOOD, EDWARD YAKER, GREGORY
WORTHAM and DAVID L. JOHNSON,

Defendants.

Bankruptcy Proceeding Chapter 7
Case No. 05-12086 (PCB)

07 CV 7852 (DC)

ECF Case

DECLARATION OF JONATHAN D. PRESSMENT

Jonathan D. Pressment, hereby declares, pursuant to 28 U.S.C. § 1746:

1. I am a member of Haynes and Boone, LLP, attorneys for defendants, Francis Connolly and Joan Ramer, as co-executors of the Estate of Allen Thurgood ("Estate of Thurgood"). This declaration is submitted to provide the Court with documents pertinent to the Estate of Thurgood's motion to dismiss Counts Three and Four of the Complaint in this action.

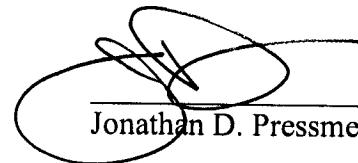
2. A true and correct copy of the Complaint in this action, dated March 28, 2007, is annexed as Exhibit A.

3. A true and correct copy of the Court's Memorandum Decision, dated January 17, 2008, is annexed as Exhibit B.

4. A true and correct copy of an e-mail from Andrea Fisher, counsel for the Trustee, dated March 6, 2008, is annexed as Exhibit C.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: May 27, 2008



Jonathan D. Pressment